



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 17, 2018

Via ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United State Courthouse
40 Foley Square, Courtroom 1306
New York, New York 10007

Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (ALC)*

Dear Judge Carter:

We write to respectfully request permission to file a short surreply in connection with the defendant's bail application. In particular, the Government wishes to supplement the record with exhibits addressing concerns raised by the Court at the April 11, 2018 conference and assertions made by the defendant in his reply concerning (i) the defendant's ability to flee to Iran; (ii) the defendant and his father's financial resources; and (iii) the ability of the defendant and his father to reimburse co-signers in the United States. The surreply will be less than three pages long and will attach exhibits that the Government will reference during tomorrow's bail proceeding.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: _____ /s/

Andrew DeFilippis
Matthew Laroche
Assistant United States Attorneys
(212) 637-2420

Garrett Lynch
Special Assistant United States Attorney

cc: Defense Counsel (via ECF)